U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT ENFORCEMENT AND REMOVAL OPERATIONS ICE HEALTH SERVICE CORPS

OPEN DOOR POLICY

IHSC Directive: 01-21

ERO Directive Number: 11765.2

Federal Enterprise Architecture Number: 306-112-002b

01 Dec 2015

By Order of the Acting Assistant Director Stewart D. Smith, DHSc/s/

 PURPOSE: The purpose of this directive is to establish the Assistant Director's (AD) guidance within ICE Health Service Corps ("IHSC") regarding open door policies.

2. APPLICABILITY: This directive applies to all ICE Health Service Corps (IHSC) personnel, including but not limited to, Public Health Service (PHS) officers, employees, and federal contractors. It is applicable to IHSC-staffed facilities supporting health care operations in ICE owned or contracted detention facilities, and to IHSC Headquarters staff.

3. AUTHORITIES AND REFERENCES:

- **3-1.** Department of Homeland Security; DHS Directives System, MD Number: 250-04; Revision Number: 00; Issue Date 05/31/2007; Human Relations
- 3-2. Title VII of the Civil Rights Act of 1964
- 4. POLICY: PHS officers, civilian employees and contractors have the right to seek advice and counsel from their leaders. The IHSC AD's door and the door of all supervisors in IHSC are open to allow subordinates an opportunity to communicate with their chain-of-command. Every supervisor has an open door policy.
 - 4-1. Problem solving is an inherent responsibility of leadership and is expected of subordinates. The AD encourages all IHSC employees to resolve problems and concerns by working through normal channels via their chain of command. While not encouraging by-passing levels in the supervisory chain, there may be occasions when it is appropriate to do so. If an individual does not feel comfortable discussing a problem with his or her supervisor, he or she may take the matter to a higher level supervisor.

- 4-2. If the employee's immediate and higher level chain of command are unable to resolve a problem, the AD's door is always open. The employee may schedule an appointment by contacting his office at (202) 732-6478. An employee who is the subject of an on-going adverse administrative action(s) must coordinate through the IHSC Deputy Assistant Director for Administration prior to scheduling an appointment.
 - a. If making an appointment is not feasible, the employee may contact the IHSC Hotline at (6)/6)/(b)/(7)/(C)
 - b. The AD and his/her staff treat these messages very seriously and will provide a response on the topic in a timely manner.
- **4-3.** Unit Chiefs, Health Services Administrators and other supervisory personnel will disseminate this policy and include it in orientation for newly assigned personnel.
- 5. **PROCEDURES:** None other than as noted above.
- **6. HISTORICAL NOTES:** This directive replaces the previous version dated 7 Nov 2013. The only change is to the date of NCCHC reference from 2008 to 2014.
- 7. **DEFINITIONS:** See definitions for this policy at <u>IHSC Glossary</u>
- 8. APPLICABLE STANDARDS:
 - 8-1. Performance Based National Detention Standards (PBNDS):

PBNDS 2011: 7.3 Staff Training; C. Initial and Annual Training

- 8-2. American Correctional Association (ACA):
 - a. Performance-Based Standards for Adult Local Detention Facilities, 4th edition
 - (1) 4-ALDF-7B-05, Training and Staff Development
 - (2) 4-ALDF-7D-08, Policies and Procedures
 - Standards for Adult Correctional Institutions, 4th edition
 (1) 4-4082, Training Requirements
 - c. Performance-Based Standards for Correctional Health Care in Adult Correctional Institutions
 - (1) 1-HC-2A-06, Employee Orientation

8-3. National Commission on Correctional Health Care (NCCHC):

- a. Standards for Health Services in Jails, 2014, J-C-09: *Orientation for Health Staff*
- **9. RECORDKEEPING.** IHSC maintains reports generated for temporary use to answer official requests until their usefulness is outlived. They are maintained by the responsible respondent. The IHSC Medical Quality Management Unit electronically maintains directives and other official guidance.
- 10. NO PRIVATE RIGHT STATEMENT. This directive in an internal policy statement of IHSC. It is not intended to, and does not create any rights, privileges, or benefits, substantive or procedural, enforceable against the United States; its departments, agencies, or other entities; its officers or employees; or any other person.